

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA :  
:  
- v. - :  
:  
WILLIAM MORRO, :  
:  
Defendant. :  
:  
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**SUPERSEDING**  
**INFORMATION**

S18 17 Cr. 630 (ER)

**COUNT ONE**  
**(Conspiracy to Commit Bank Fraud)**

The United States Attorney charges:

1. In or about 2016, in the Southern District of New York and elsewhere, WILLIAM MORRO, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and an object of the conspiracy that WILLIAM MORRO, the defendant, and others known and unknown, knowingly would and did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, as that term is defined in Title 18, United States Code, Section 20, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such a financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344, to wit, a scheme to conceal the source and origin of funds connected to "OneCoin," a purported cryptocurrency, which involved making false statements to banks regarding the source and origin of those funds.

**Overt Acts**

3. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about 2016, WILLIAM MORRO, the defendant, received funds connected to “OneCoin” into bank accounts that he controlled in China and caused a portion of those proceeds to be transferred to other accounts, including to a bank account held at a bank in the United States, and did not disclose, among other things, that the funds were derived from “OneCoin.”

b. Between on or about March 16, 2016, and on or about April 21, 2016, MORRO caused approximately \$35 million in funds connected to “OneCoin” to be transferred from accounts in China to an account in Hong Kong (the “Hong Kong Account”).

c. Between on or about April 12, 2016, and June 23, 2016, MORRO caused approximately \$6,250,000 in funds connected to “OneCoin” to be transferred from the Hong Kong Account to an account MORRO controlled in the United States.

(Title 18, United States Code, Section 371.)

**FORFEITURE ALLEGATION**

4. As a result of committing the bank fraud offense alleged in Count One of this Information, WILLIAM MORRO, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

Substitute Asset Provision

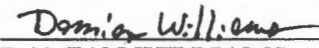
5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;  
Title 21, United States Code, Sections 853; and  
Title 28, United States Code, Section 2461.)

  
DAMIAN WILLIAMS  
United States Attorney  
Southern District of New York